

1 2 3 4 5 6 7 8 9	LAUREN GALLO WHITE, State Bar No. 309075 WILSON SONSINI GOODRICH & ROSATI Professional Corporation One Market Plaza Spear Tower, Suite 3300 San Francisco, CA 94105 Telephone: (415) 947-2000 Facsimile: (415) 947-2099 Email: lwhite@wsgr.com MENG JIA YANG, State Bar No. 311859 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: mjyang@wsgr.com		
11	Attorneys for Defendant GOOGLE LLC		
12 13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION		
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16 17 18 19 20 21 22 23 24 25 26 27 28	AMBASSADOR MARC GINSBERG and COALITION FOR A SAFER WEB, Plaintiffs, V. GOOGLE LLC, Defendant. CASE NO.: 5:21-CV-00570-BLF CASE NO.: 5:21-CV-00570-BLF CASE NO.: 5:21-CV-00570-BLF JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE OPPOSITION TO MOTION TO DISMISS FIRST AMENDED COMPLAINT AND TIME TO FILE REPLY Judge Beth Labson Freeman		
	JOINT STIPULATION AND [PROPOSED] -1- CASE NO.: 5:21-CV-00570-BLF ORDER TO EXTEND TIME		

1 JOINT STIPULATION 2 Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, "Plaintiffs"), 3 and Defendant Google LLC, erroneously sued as Google Inc. ("Google"), jointly submit this 4 Stipulation to extend (1) Plaintiffs' deadline to oppose Google's motion to dismiss the First 5 Amended Complaint("FAC"); and (2) Google's deadline to file a reply in support of its motion to dismiss: 6 7 WHEREAS, Plaintiffs filed their complaint on January 25, 2021; 8 WHEREAS, Google filed a motion to dismiss the complaint (ECF 14); 9 WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF 10 16), Plaintiffs' deadline to submit an opposition to Google's motion to dismiss was June 7, 2021; 11 WHEREAS, in lieu of filing an opposition to Google's motion to dismiss, Plaintiffs filed their FAC on June 8, 2021 (ECF 17) and a corrected FAC on June 11, 2021 (ECF 19); 12 13 WHEREAS, pursuant to the stipulation of the parties (ECF 18) granted by this Court (ECF 14 21), Google's deadline to respond to the FAC was July 13, 2021; 15 WHEREAS, Google filed a motion to dismiss the FAC (ECF 23) on July 13, 2021; 16 WHEREAS, pursuant to Local Rule 7-3, Plaintiffs' deadline to oppose the motion to 17 dismiss is July 27, 2021 and Google's deadline to file a reply is August 3, 2021; 18 WHEREAS, Plaintiffs' counsel and Google's counsel have agreed to an extension of 19 Plaintiffs' deadline to oppose the motion to dismiss to September 13, 2021 and an extension of 20 Google's deadline to file a reply to November 15, 2021; 21 WHEREAS, the parties submit that this extension is appropriate in light of the hearing 22 date set for the motion to dismiss the FAC of December 16, 2021; the extended briefing timeline 23 will not cause undue delay and will allow both parties to account for relevant authorities issued 24 between the filing of Google's motion to dismiss and the December 16 hearing; 25 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval, to the following: 26 27 1. Plaintiffs' deadline to oppose the motion to dismiss shall be extended from July 28 27, 2021 to September 13, 2021;

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1	2. Google's deadline to file a reply shall be extended from August 3, 2021 to		
2	November 15, 2021.		
3		Respectfully submitted,	
4	Dated: July 13, 2021	WILSON SONSINI GOODRICH & ROSATI Professional Corporation	
5		By: /s/Mena lia Yana	
6		By: /s/ Meng Jia Yang Meng Jia Yang	
7		mjyang@wsgr.com	
8		Attorneys for Defendant GOOGLE LLC	
10	Dated: July 13, 2021	THE LAW OFFICE OF KEITH ALTMAN	
11		By: /s/ Keith Altman	
12		Keith Altman kaltman@lawampmmt.com	
13		-	
14		Attorneys for Plaintiffs AMBASSADOR MARC GINSBERG and	
15		COALITION FOR A SAFER WEB	
16	SIGNATURE ATTESTATION		
17	I, Meng Jia Yang, hereby attest that all other signatories listed, and on whose behalf the		
18	filing is submitted, concur in the filing's content and have authorized the filing of this e-filed		
19	document.		
20		By: /s/ Meng Jia Yang	
21		Meng Jia Yang	
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23	PURSUANT TO STIPULATION, IT IS SO ORDERED		
24			
25	Dated:		
26	Butcu.	Honorable Beth Labson Freeman	
27		United States District Court Judge	
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20	JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME	-3- CASE No.: 5:21-CV-00570-BLF	